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8 IN THE UNITED STATES DISTRICT COURT  
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10 FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

11 Steven Nerayoff, ) Case No.: C 07-03101 JW  
12 )  
13 Plaintiff, ) **JOINT STIPULATED REQUEST FOR**  
14 vs. ) **AN ORDER EXTENDING TIME TO**  
15 Rager, Bell, Daskocil and Meyer, et al., ) **RESPOND TO COMPLAINT AND**  
16 Defendants. ) **[PROPOSED] ORDER**

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18 NOW COME the parties, Plaintiff Steven Nerayoff ("Plaintiff") and Defendants Rager,  
19 Bell, Daskocil and Meyer ("RBDM") and Brad Daskocil ("Defendants") (all parties herein are  
20 collectively referred to as the "Parties"), by and through their counsel of record and as a  
21 stipulation in the above referenced matter, state as follows.

22 1. Defendant RBDM was served with the Summons and Complaint in this matter on  
23 or about October 4, 2007 and its response is due October 24, 2007.

24 2. Defendant Brad Daskocil, CPA was served with the Summons and Complaint in  
25 this matter on or about October 5, 2007 and his response is due October 25, 2007.

26 3. Defendants RBDM and Brad Daskocil appear specially before the Court in this  
27 Joint Stipulated Request for the sole purpose stated herein and do not waive any and all objections  
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1 that may be asserted as to venue or other matters. Further, this stipulation is entered into and the  
2 special appearance is made without any prejudice to Defendants ability to bring a motion to  
3 dismiss this action and/or to bring a motion for an order transferring this action on the grounds  
4 that venue in the Northern District is improper.  
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6 4. The Parties to the above-referenced matter have informally discussed preliminary  
7 matters regarding possible change of venue and tolling agreements, and believe that these matters  
8 may be resolved by the Parties before an appearance is required by the Defendants.

9 5. Further investigation into the facts, circumstances, and issues in this case merit an  
10 extension of time for Defendants to respond to the Complaint.

11 **STIPULATION**

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13 1. The parties hereby stipulate and jointly request that the date for Defendants to  
14 respond to the Complaint be extended pursuant to Federal Rules of Civil Procedure 6 and Civil  
15 Local Rule 6-2 to November 9, 2007;

16 2. Plaintiff's reply to Defendants' responses to the Complaint and to any motions  
17 therein shall be due on December 9, 2007;

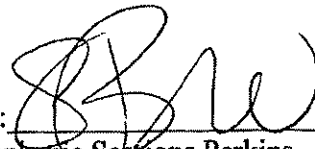
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1 3. Any requirements under Rule 26 are similarly continued for 15 days.

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3 DATED: October 24, 2007

**CHAPMAN, GLUCKSMAN & DEAN**  
A Professional Corporation

5  
6 By:   
7 Stephanie Sessions Perkins  
8 Attorneys for Specially Appearing Defendants,  
9 RBDM Rager Meyers Accountancy Corporation and  
10 Brad Daskocil, CPA

11 DATED: October 25, 2007

**RICE & BRONITSKY**

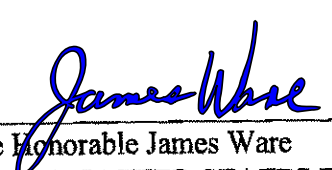
12  
13 By:   
14 Paul E. Rice, Esq.  
15 Attorney for Plaintiff, Steven Nerayoff

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
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3 DATED: November 2, 2007  
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The Honorable James Ware  
JUDGE OF THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA

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